

## **Title Page**

### **Name and Address of Submitter**

*Livinguard, AG*  
Bahnhofstrasse 12  
6300 Zug, Switzerland

### **Study Title**

Request for Waiver for Primary Eye Toxicity  
OCSPP Guideline 870.2400

### **Product**

Fabric treated with Livinguard® Technology  
EPA Reg. No. 95700-R

Date: 2/20/2020

### **Statements of No Data Confidentiality Claims**

No claim of confidentiality is made for any information contained in this study on the basis of its falling within the scope of FIFRA section 10(d) (1) (A), (B), or (C).

Company : Livinguard, AG

Company Agent: Kevin Kutcel

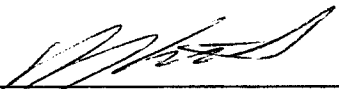
Date: 2/20/2020

Signature

A handwritten signature in black ink, appearing to read 'Kutcel', is written over a horizontal line.

## Good Laboratory Practice Statement

This document is descriptive. The descriptive information is not subject to the requirements of 40 CFR Part 160.

Sponsor/Submitter  Date 2/20/2020  
Kevin R. Kutcel  
Registration Agent

Request for Waiver for Primary Eye Toxicity  
“Fabric treated with Livinguard® Technology”  
EPA Reg. No. 95700-R

## **OCSPP Guideline 870.2400: Primary Eye Toxicity**

### **Introduction**

“Fabric treated with Livinguard® Technology” is an Enduse Product that contains the following active ingredients:

3 (Trimethoxysilyl) Propyldimethyloctadecylammoniumchloride	0.59%
Polyhexamethane Hydrochloride	0.23%
Silver Ions	0.16%
Propiconazole	0.40%

The total concentration of active ingredients in this product is 1.38%. Please note that the active ingredients are impregnated into a treated fabric that comprises 98.62% of the product. Thus, the enduse product is fabric that has been treated with the active ingredients above.

### **Rationale for Requesting Waiver for Primary Eye Toxicity**

According to the 2012 Guidance for Waiving or Bridging of Mammalian Acute Toxicity Tests for Pesticides, the product may be waived for Primary Eye Toxicity if the product design prevents ocular exposure. In conversing with Product Safety Labs, it is not practical to conduct a Primary Eye Toxicity study on a piece of fabric as there is no logical means by which the can be exposed to the eye. Therefore, the registrant requests that the Primary Eye Toxicity requirement for the “Fabric Treated with Livinguard® Technology” be waived.